

MAY 15 2019



10 CFR 50.54(q)  
10 CFR 50.4(b)(5)

LR-N19-0059

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Salem Nuclear Generating Station, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-70 and DPR-75  
NRC Docket Nos. 50-272 and 50-311

Hope Creek Generating Station  
Renewed Facility Operating License No. NPF-57  
NRC Docket No. 50-354

Subject: Emergency Plan Document Revision Implemented April 17, 2019

Pursuant to 10 CFR 50.54(q) and 10 CFR 50.4(b)(5), PSEG Nuclear LLC (PSEG) is submitting 10 CFR 50.54(q) Summary Analysis Reports, numbered 2018-64 and 2019-08, for the Emergency Plan Document revisions implemented on April 17, 2019 (Attachment 1). Copies of the revised Emergency Plan documents have been included in their entirety as Enclosure 1.

There are no regulatory commitments contained in this letter.

Should you have any questions or require any additional information regarding this submittal, please contact Mr. Phil Quick, at (856) 339-3262.

Respectfully,

A handwritten signature in black ink, appearing to read "S. Barr".

Stephen T. Barr  
Manager, Emergency Preparedness

Attachment 1 – 10 CFR 50.54(q) Summary Analysis Reports: 2018-64 and 2019-08

Enclosure 1 – Emergency Plan Document Revisions

cc (with Attachment 1): David C. Lew, Administrator, Region I, NRC  
James Kim, Project Manager, NRC  
Justin Hawkins, NRC Senior Resident Inspector, Salem  
Adam Ziedonis, NRC Senior Resident Inspector, Hope Creek  
(without Enclosures): Patrick Mulligan, Chief, NJBNE  
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T. Cachaza, Commitment Tracking Coordinator, Salem  
K. Stokes, Commitment Tracking Coordinator, Hope Creek

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**ATTACHMENT 1**

**10 CFR 50.54(q) Summary Analysis Reports:  
2018-64 and 2019-08**

**ATTACHMENT 3**  
**10CFR50.54(q) SUMMARY ANALYSIS REPORT**  
Page  1  of  2   
Revision  0

**50.54Q I.D. Number:**  2018-64

**50.54Q Title:**  Emergency Plan Section 17, Rev. 24, Emergency Plan Administration

(Doc #, Rev. #, Name, If applicable)

Description of the change made to the Emergency Plan/Procedures:

Emergency Plan Section 17 is being revised to replace references to “Plant Operations Review Committee (PORC)” with “Fleet Review Committee (FRC)” to align the Emergency Plan with current fleet processes in accordance with LS-AA-106.

Specifically, the following in step 1.2:

“Plant Operations Review Committee (PORC) reviews non-editorial revisions to the Emergency Plan. PORC also reviews changes to other EPDs if a 10 CFR 50.54(q) review indicates a potential reduction in effectiveness of the emergency plan.”

Is being changed to:

“Non-editorial revisions to the Emergency Plan are reviewed in accordance with the Fleet Review Committee (FRC) process. Changes to other EPDs are reviewed in accordance with the FRC process if a 10 CFR 50.54(q) review indicates a potential reduction in effectiveness of the emergency plan.”

The “PORC” heading in Table 17-1 is being changed to “FRC”.

Additionally, the following is being added to step 1.1:

“The Manager EP reports to the Senior Director - Regulatory Operations and Nuclear Oversight, who reports to the President and Chief Nuclear Officer.”

This change will align section 17 with section 2 by adding information regarding the reporting relationships of the Manager EP and the Senior Director – Regulatory Operations and Nuclear Oversight.

An editorial change is also being made to correct a pagination error. The header of “Table 17-1” appeared on the bottom of page 3 when it should have been at the top of page 4. This error is being corrected with this revision.

Description of why the change is editorial (if not editorial, N/A this block):

N/A

**ATTACHMENT 3**  
**10CFR50.54(q) SUMMARY ANALYSIS REPORT**

Page 2 of 2  
Revision 0

**50.54Q I.D. Number:** 2018-64

**50.54Q Title:** Emergency Plan Section 17, Rev. 24, Emergency Plan Administration

(Doc #, Rev. #, Name, If applicable)

Description of the licensing basis affected by the change to the Emergency Plan/Procedure (if not affected, omit this element):

Emergency Plan section 17 currently states that PORC reviews non-editorial revisions to the Emergency Plan and selected other Emergency Plan Document changes. Along with the name change from Plant Operations Review Committee to Fleet Review Committee, the FRC process per LS-AA-106 has been changed to allow for more reviews to be completed by the corporate organization. The proposed change to Emergency Plan section 17 states that non-editorial revisions to the Emergency Plan will be reviewed in accordance with the Fleet Review Committee process in order to recognize that the changes will be reviewed in accordance with LS-AA-106. Reviews conducted IAW the FRC process may be performed by either FRC or SRC, depending on the nature of the change. The new FRC process has been reviewed and it has been determined that Emergency Plan changes will still receive independent reviews focused on nuclear safety under the new process.

A description of how the change to the Emergency Plan/Procedures still complies with regulation:

The change to Emergency Plan section 17 is being made to align with the revision to the PORC process. The change to the PORC process has received the required reviews in accordance with the AD-AA process.

The changes to the LS-AA-106 process are designed to reduce the burden on the station by allowing more reviews to be conducted by the corporate organization. Although the process is different, it will still allow for a sufficiently independent review of Emergency Plan changes to be conducted.

The proposed Emergency Plan revision has been reviewed and found to be consistent with the following regulatory documents:

- 10 CFR Appendix E to Part 50, IV. Content of Emergency Plans, G. Maintaining Emergency Preparedness
- Regulatory Guide 1.219, Section 4.16, Emergency Plan Maintenance

A description of why the proposed change was not a reduction in the effectiveness of the Emergency Plan/Procedure:

Emergency Plan section 17 is established to ensure that emergency plan and emergency plan document changes receive the appropriate reviews. The proposed change from PORC to FRC aligns with the change to the LS-AA-106 process and preserves the requirement that non-editorial emergency plan changes and selected emergency plan document changes receive an independent review. Therefore, there is no reduction in effectiveness of the PSEG Nuclear Emergency Plan.

**ATTACHMENT 3**  
**10CFR50.54(q) SUMMARY ANALYSIS REPORT**

Page 1 of 2  
Revision 0

**50.54Q I.D. Number:** 2019-08

**50.54Q Title:** Emergency Plan Section 4, Rev. 15, Emergency Response Support and Resources

(Doc #, Rev. #, Name, If applicable)

Description of the change made to the Emergency Plan/Procedures:

This revision to section 4 of the Emergency Plan incorporates the following changes:

- Added the following statement in section 2.0 regarding state of NJ support in the event of a hostile action:  
“In the event of a hostile action impacting the PSEG Nuclear site, the state of New Jersey will provide support per the state’s emergency plan.”
- Editorial change to correct the font in the reference to Figure 4-1 in section 4.0

Description of why the change is editorial (if not editorial, N/A this block):

N/A

Description of the licensing basis affected by the change to the Emergency Plan/Procedure (if not affected, omit this element):

Section 4 of the PSEG Nuclear Emergency Plan describes the support provided from local, state, and federal organizations. NRC rule changes to 10 CFR Appendix E required that nuclear plant operators be prepared for hostile action based events. PSEG Nuclear has previously implemented procedure, process and facility changes in preparation for such events.

A description of how the change to the Emergency Plan/Procedures still complies with regulation:

The state of NJ has incorporated support of the PSEG Nuclear site into their emergency plan. The PSEG Nuclear Emergency Plan is being revised to document what the state of NJ has already done, particularly related to the response to hostile action events.

The state of NJ is required to provide support during hostile actions due to PSEG’s Memorandum of Understanding (MOU) with the New Jersey State Police and Department of Environmental Protection. This MOU is Attachment 3 to the PSEG Nuclear Emergency Plan and includes section III.B. on Hostile Actions. The New Jersey State Police have created a procedure for responding to HAB Events at the PSEG Nuclear site, SOP-908, Procedure for HAB Events at S/HC.

The proposed change complies with 10 CFR 50 Appendix E and with Regulatory Guide 1.219, Rev. 1, 4.3.

**ATTACHMENT 3**  
**10CFR50.54(q) SUMMARY ANALYSIS REPORT**

Page 2 of 2  
Revision 0

**50.54Q I.D. Number:** 2019-08

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**50.54Q Title:** **Emergency Plan Section 4, Rev. 15, Emergency Response Support and Resources**

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(Doc #, Rev. #, Name, If applicable)

A description of why the proposed change was not a reduction in the effectiveness of the Emergency Plan/Procedure:

The proposed change to section 4 of the Emergency Plan will state the agreement that is already in place regarding the state of NJ's response to a hostile action event at the PSEG Nuclear site. There is no reduction in effectiveness of the PSEG Nuclear Emergency Plan by stating this arrangement in section 4 of the Plan.

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**ENCLOSURE 1**

**EMERGENCY PLAN DOCUMENT REVISIONS  
IMPLEMENTED APRIL 17, 2019**



## SECTION 4

### EMERGENCY RESPONSE SUPPORT AND RESOURCES

#### 1.0 Local Services Support

The local services support to be relied on in the event of an emergency is classified into two general categories: Medical and Fire Protection.

#### 1.1 Medical Support

Medical support is provided by the Memorial Hospital of Salem County. The specific resources and capabilities of medical support are provided in Section 13.0 of this Plan.

#### 1.2 Fire Protection

Fire protection support is provided for Salem and Hope Creek Generating Stations in accordance with station technical specifications. The resources are provided at the request of the Shift Manager (SM) of the affected unit or Emergency Duty Officer (EDO). Additionally, local fire companies respond (in accordance with appropriate agreements) to fires at Salem and Hope Creek Generating Stations. While these personnel are onsite they will be under the direction and control of the SM or Control Room Supervisor (CRS) of the affected unit prior to OSC activation and under the direction and control of the OSC coordinator after the OSC is activated.

#### 2.0 State and County (Local) Government Response

For events classified as an Unusual Event, Alert or Site Area Emergency, the contact with the local governments and states is provided through the states. Following this initial contact, the states will be responsible for assessing the information provided, activating their response organization (as required) notifying the local governments, the U.S. Coast Guard and the public. If the states cannot be contacted within fifteen minutes, the affected station notifies the local governments (counties) and the U.S. Coast Guard directly.

For events classified as a General Emergency, Salem and Hope Creek Generating Stations make direct contact with the States of New Jersey and Delaware. If the states cannot be contacted within fifteen minutes, the affected station notifies the local governments (counties) and the Coast Guard. Following this initial contact the states, or if the states could not be contacted the counties, will be responsible for assessing the information provided, activating their response organization (as required), notifying appropriate local governments, and the public.

Following contact by the state, or PSEG Nuclear LLC, each county and the U.S. Coast Guard are responsible for assessing the information provided and activating their response organizations.

The Plan provides the appropriate space and facilities to the principal State and Federal response organizations at the Emergency Operations Facility (EOF). PSEG Nuclear assigns a person to assist the States of New Jersey and Delaware in accordance with the Memorandum of Understanding with each State. This allows state response personnel to have immediate access to all station radiological and operational data. Additionally, PSEG Nuclear LLC is prepared to provide representatives to the state EOCs to assist the state (at their request) in answering questions and contacting the appropriate utility personnel.

In the event of a hostile action impacting the PSEG Nuclear site, the state of New Jersey will provide support per the state's emergency plan.

### 3.0 Federal Response

The federal response is expected to consist primarily of representatives from the U.S. Department of Energy (U.S. DOE), U.S. Nuclear Regulatory Commission (NRC), and U.S. Coast Guard (USCG). PSEG Nuclear LLC provides space in the EOF as required. Since the federal response (other than NRC) is primarily related to offsite protective actions and radiological assessment, it is implemented at the request of the States of New Jersey and/or Delaware. The Federal Emergency Management Agency (FEMA) acts as coordinator of the federal response. Emergency Management from New Jersey and Delaware provides information and assistance to FEMA as required to assist it in coordinating the federal response.

#### 3.1 U.S. Nuclear Regulatory Commission

The NRC is notified via a dedicated telephone line (ENS) from the Control Room, Technical Support Center (TSC) or Emergency Operations Facility (EOF), to the Rockville, Maryland Operations Center within one hour after identifying the existence of an emergency condition. The NRC is responsible for the coordination of the federal government's technical response activities. Response support is initially supplied by the Office of Inspection and Enforcement, Region I, King of Prussia, Pennsylvania.

#### 3.2 U.S. Coast Guard (USCG)

The U.S. Coast Guard is notified of all emergency events at Salem and Hope Creek Generating Stations. At the request of the States of New Jersey or Delaware they will provide rescue and/or notification operations on the Delaware River and associated waterways.

#### 3.3 U.S. Department of Energy (DOE)

Radiological assistance teams are provided by Brookhaven National Laboratories, Brookhaven Area Office in Upton, New York. This assistance generally is requested by the States of New Jersey and Delaware. DOE is responsible for coordinating the offsite radiological monitoring and evaluation activities of the federal government.

### 3.4 Federal Emergency Management Agency (FEMA)

FEMA has the responsibility for coordinating all offsite non-technical response activities of the federal government. They serve as the primary point of contact for requests for federal assistance from state and local officials, and other federal agencies.

### 3.5 National Weather Service

When requested, the National Weather Service provides backup meteorological data for Salem and Hope Creek Generating Stations.

### 4.0 Federal Resources

The resources of the Federal government through the implementation of the National Response Plan (NRP) Nuclear/Radiological Incident Annex may be used to supplement the onsite surveys or relieve utility offsite survey teams. This Plan does not use NRP resources for making protective action assessments or recommendations.

The individual assigned the emergency coordinator function is the utility individual who is authorized to request NRP resources. The NRP teams are instructed to go to the EOF and report to the Radiological Support Manager. Survey team efforts offsite are managed and survey data are assembled and analyzed at the EOF.

The EOF is also the location where the Federal response coordination will be conducted. Desks and phones are available at the EOF to support the Federal response by the lead federal agency - NRC. Figure 4-1 provides information on airports near the site.

### 5.0 Other Organizations

Other organizations that are available for emergency support duties are called upon and report to the Technical Support Center (TSC) or Emergency Operations Facility (EOF).

## 5.1 Environmental Sampling, Analysis and Meteorology Consultation

The PSEG Laboratory & Testing Services (LTS) is a wholly owned research subsidiary of PSEG. LTS provides environmental sampling services for the station's Radiological Environmental Monitoring Program (REMP) during normal station operations. During an emergency involving a release of radioactivity and upon request, LTS provides personnel who normally collect routine environmental samples to assist in emergency environmental sample collection. PSEG Nuclear LLC also maintains a service contract with an independent certified laboratory to provide analysis of environmental samples for both normal and emergency operations. The contracted laboratory maintains the ability and equipment to perform beta-gamma gross counting, alpha gross counting, alpha spectroscopy, gamma spectroscopy and beta scintillation analysis. As needed for meteorology consultation, PSEG Nuclear maintains a contract with a meteorology evaluation contractor as well as a MOU with the National Weather Service. After a radiological release, environmental sample collection and analysis would be coordinated through the PSEG Nuclear Emergency Response Organization as requested by the Emergency Coordinator (or designee) in accordance with Emergency Plan Implementing Procedures.

## 5.2 Reactor Vendor

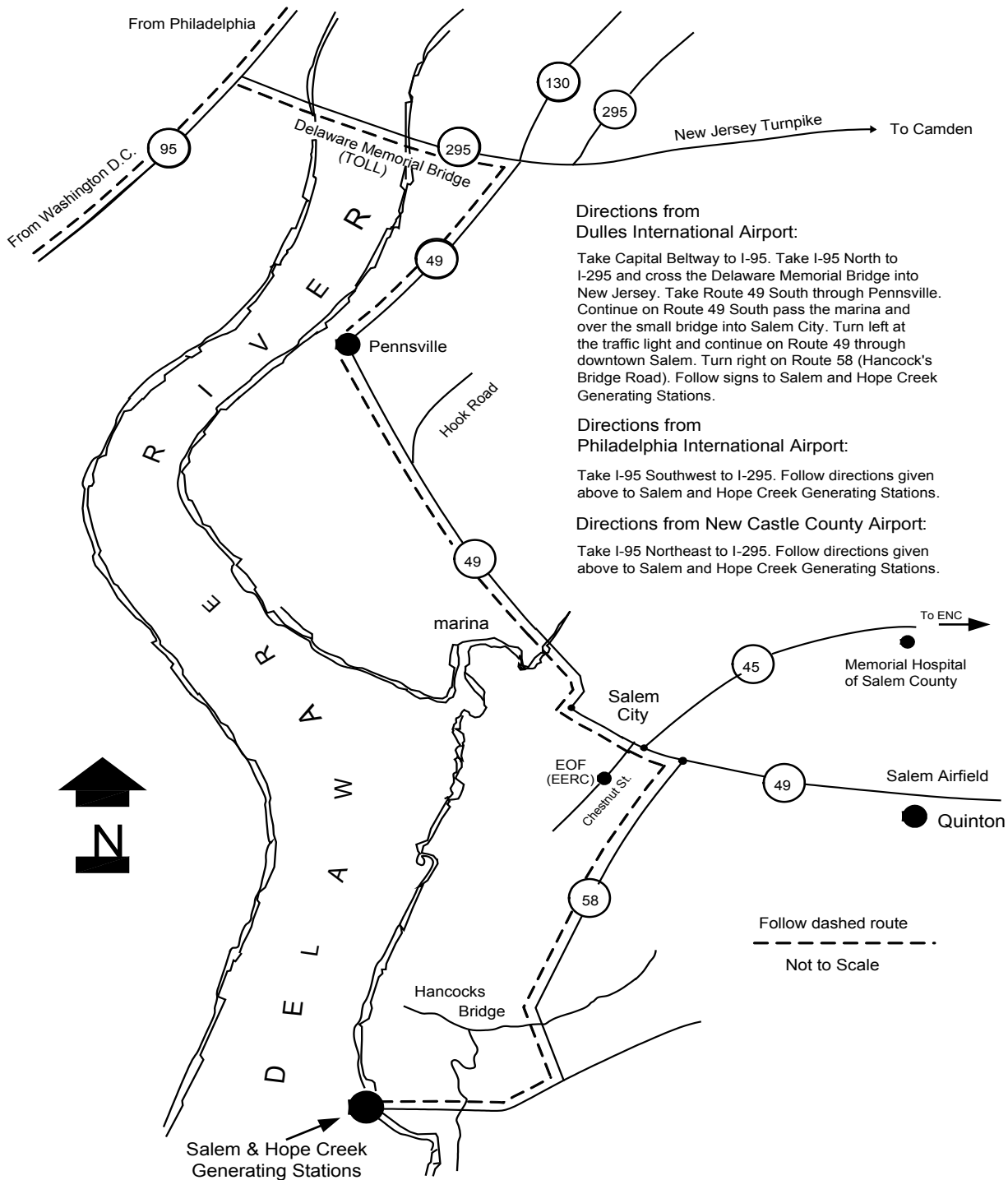
The emergency response capabilities of both Nuclear Steam Supply System (NSSS) vendors in support of Salem and Hope Creek Generating Stations are provided in supplements to the Plan listed in Emergency Plan attachment document.

## 5.3 Institute of Nuclear Power Operations (INPO)

INPO requested that all utilities with nuclear generating stations provide INPO with information concerning material and personnel resources. This information is available in their "Emergency Resources Manual," to which PSEG Nuclear is a signatory. This source of information, available on-line at the INPO website, is used by the emergency coordinator function in requesting assistance from other Utility Companies.

Supplementing this Plan in the Emergency Plan attachment document is the letter of agreement from INPO that outlines INPO's role in assisting a member utility during an emergency.

**FIGURE 4-1  
SALEM and HOPE CREEK GENERATING STATIONS  
ACCESS FROM AREA AIRPORTS**



## SECTION 17

### EMERGENCY PLAN ADMINISTRATION

#### 1.0 Responsibility

##### 1.1 General

The President and Chief Nuclear Officer - PSEG Nuclear LLC has the overall responsibility for the development and updating of emergency planning and coordination of the plans with other response organizations.

The Manager Emergency Preparedness (MEP) has been delegated the authority to approve Emergency Preparedness Documents (EPDs) and EP Forms for adequacy and consistency. The Manager EP reports to the Senior Director - Regulatory Operations and Nuclear Oversight, who reports to the President and Chief Nuclear Officer.

The MEP is assigned the responsibility for ensuring that the EPDs and EP Forms are appropriately interfaced with the plans, procedures, and training of offsite support agencies as required maintaining suitable timely notifications and development of protective action recommendations. The organization for coordination and direction of emergency planning matters is shown in Figure 17-1.

##### 1.2 Review and Approval of Emergency Preparedness Documents

The MEP and an Emergency Preparedness Manager (EPM) approves all revisions to EPDs and EP Forms. The Salem/Hope Creek Plant Managers approve applicable non-editorial changes to EPDs and EP Forms. Revisions to the EPDs and EP Forms require a 10 CFR 50.54(q) review. Non-editorial revisions to the Emergency Plan are reviewed in accordance with the Fleet Review Committee (FRC) process. Changes to other EPDs are reviewed in accordance with the FRC process if a 10 CFR 50.54(q) review indicates a potential reduction in effectiveness of the emergency plan. The review and approval of the Emergency Plan and associated documents will be done in accordance with Table 17-1. **(EP96-004)**

##### 1.3 Training Procedures/Lesson Plans

It is the responsibility of the MEP, or designee, to review and revise the Training Procedures/Lesson Plans in accordance with the Nuclear Emergency Preparedness Training Program. The Training Procedures/Lesson Plans are based on the approved Emergency Plan and Procedures.

#### 2.0 Revisions

Revisions to the EPDs and EP Forms are made whenever such changes are necessary to ensure that the Emergency Plan can be implemented. The details are contained in the Emergency Preparedness Administrative Procedures.

Any holder of EPDs and EP Forms may prepare revision(s) to any document. Under normal circumstances, EPDs and EP Forms revisions (other than editorial only revisions) are reviewed by the "Responsible Manager" per Table 17-1 for the given procedure. The person requesting the revision, in accordance with appropriate PSEG Nuclear LLC procedures, should initiate a revision request via the corrective action program.

A list of each section or procedure is maintained in front of the Emergency Plan and Emergency Plan Implementing Procedures indicating the latest revision number and effective date.

### 3.0 Distribution

All revisions are distributed in accordance with current PSEG Nuclear procedures.

### 4.0 Annual Review

The Emergency Plan and associated documents are reviewed at least once each year. As part of the review, the Emergency Action Levels (EALs) in the Event Classification Guide are reviewed with the state and local governments. The Emergency Plan and associated documents are updated and procedures are improved, based upon training exercises/drills, and changes onsite or in the environs.

Agreement letters from offsite agencies and local support groups are verified or updated biennially or when changes/revisions to the Plan are implemented which could affect their responsibilities. Updating of telephone numbers is done quarterly and the Manager EP, or designee, coordinates this review.

### 5.0 Independent Review

The Emergency Plan and associated documents receive an independent review, at least once per 24 months in accordance with current requirements.

Management directives provide instructions for evaluation and correction of audit findings, training, readiness testing, and emergency equipment. The results of the review and actions taken are forwarded to PSEG Nuclear LLC senior management. The records of these reviews are retained for five (5) years (**EP96-004**).

### 6.0 Maintenance of Documents

The persons holding controlled copies of EPDs and EP Forms are responsible for their maintenance, which consists of promptly incorporating all revisions, additions and deletions, replacing any lost or damaged portions. Replacements for any pages are supplied upon request.

Each such distribution shall be accompanied by instructions for insertion into the document indicating which pages are to be replaced, deleted or added. The distribution shall be mailed to copyholders in accordance with current PSEG Nuclear LLC procedural requirements. A file of master copies of each revision of the plan is retained either by EP, or on PSEG Nuclear LLC approved media.

### 7.0 References

- 7.1 **EP96-004**, Remove reference to Tech Specs and add clarification to Review and Approval of Emergency Plan Documents matrix.

**TABLE 17-1**

**REVIEW AND APPROVAL OF EMERGENCY PLAN DOCUMENTS & EP FORMS**

**NOTES**

- Editorial changes to EPDs and EP Forms:
  - Only require MEP approval.
  - DO NOT require review/approval by the listed Responsible Manager.
- “As Required” means review is required if a 10 CFR 50.54(q) Effectiveness Review indicates a potential reduction in effectiveness of the Emergency Plan (**EP96-004**).
- If more than one Responsible Manager is listed for a series of procedures, the manager of the personnel performing the procedure becomes the Responsible Manager.
- For common procedures where a Salem and Hope Creek Manager exist, both managers become responsible for that procedure.

<b>Document</b>	<b>50.54(q)</b>	<b>Responsible Manager (list on next page)</b>	<b>Manager EP and EPM</b>	<b>NOS Manager</b>	<b>FRC</b>	<b>Salem/Hope Creek Plant Managers</b>
Emergency Plan All Sections	Yes	MEP	Yes	Yes	Yes	Yes
SGS ECG-EALs, ECG Technical Basis & associated Atts.	Yes	SOSM	Yes	As Required	As Required	Yes
HCGS ECG-EALs, ECG Technical Basis & associated Atts.	Yes	HOSM	Yes	As Required	As Required	Yes
<u>Common Implementing EPDs &amp; Forms</u>						
100	Yes	HOSM; SOSM	Yes	As Required	As Required	Yes
200	Yes	HOSM; SOSM	Yes	As Required	As Required	Yes
300	Yes	ED; MEP RPM; CM	Yes	As Required	As Required	Yes
<u>Salem Implementing EPDs &amp; Forms</u>						
200	Yes	ED; REM; MEP	Yes	As Required	As Required	Yes
300	Yes	RPM; CM	Yes	As Required	As Required	Yes
<u>Hope Creek Implementing EPDs &amp; Forms</u>						
200	Yes	ED; REM; MEP	Yes	As Required	As Required	Yes
300	Yes	RPM; CM	Yes	As Required	As Required	Yes
<u>EOF Implementing EPDs &amp; Forms</u>						
400	Yes	MEP	Yes	As Required	As Required	Yes
500	Yes	ED	Yes	As Required	As Required	Yes
600	Yes	RPM	Yes	As Required	As Required	Yes
700	Yes	MEP	Yes	As Required	As Required	Yes
<u>ENC Implementing EPDs &amp; Forms</u>						
EP-AA-112-600	Yes	MNC	Yes	As Required	As Required	Yes
<u>Security Implementing EPDs &amp; Forms</u>						
900	Yes	SECOM	Yes	As Required	As Required	Yes
<u>EP Admin &amp; Maintenance EPDs &amp; Forms</u> (Per EP-AA-120)	Yes	MEP	Yes	As Required	As Required	N/A



**TABLE 17-1**

**REVIEW AND APPROVAL OF EMERGENCY PLAN DOCUMENTS**

<b>ACRONYM</b>	<b>RESPONSIBLE MANAGER TITLE</b>
CM	Chemistry Radwaste and Environmental Manager (Salem or Hope Creek)
ED	Site Engineering Director (Salem or Hope Creek)
EPM	Emergency Preparedness Manager
HOSM	Hope Creek Operations Shift Manager
MEP	Manager Emergency Preparedness (EP)
MNC	Manager Nuclear Communications
REM	Reactor Engineering Manager (Salem or Hope Creek)
RPM	Radiation Protection Manager (Salem or Hope Creek)
SECOM	Manager - Security Operations
SOSM	Salem Operations Shift Manager

**Figure 17-1  
ORGANIZATION FOR COORDINATION  
OF EMERGENCY PLANNING**

<b>Manager Emergency Preparedness</b>
---------------------------------------

<b>Onsite Planning, Facilities and Equipment</b>		<b>Offsite Planning</b>
<b>Onsite Emergency Planning</b>	<b>Emergency Facilities</b>	<b>Offsite Emergency Planning and Liaison</b>
Develop and implement PSEG Nuclear Emergency Plan administrative procedures	Maintain the emergency response facilities program.	Maintain Emergency Preparedness agreements for offsite programs
Coordinate, develop and maintain the Emergency Plan procedures	Evaluate and coordinate facilities and equipment changes	Coordinate state, county, local and offsite agency interface.
Maintain Emergency Preparedness Administrative Programs	Conduct surveillance and maintenance of ERF documents	Conduct drill/exercise program and interface for offsite programs
Develop drill/exercise scenarios	Conduct communications system surveillance program	Assist offsite agencies with annual 44CFR350 certification
Conduct drill/exercise program and ensure readiness	Implement correction of identified facilities and equipment deficiencies	
Implement the overall deficiency identification and corrective action program	Maintain emergency response activation system	
Conduct EP self-assessment program	Maintain ANS program documentation	
Maintain EP training program		